

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

ALEJANDRO COSTILLA, §
TDCJ-CID No. 873142 §
§
v. § CIVIL ACTION No. 2:16-CV-57
§
KEN PUTNAM, et al. § JURY
Defendants. §

Defendants Putnam, Crouch, and Salazar's Answer and Jury Demand

Defendants Ken Putnam, John Crouch, and Juan Salazar file their answer, denying the Plaintiff's allegations. Pursuant to Rule 8(b), Federal Rules of Civil Procedure, Defendants Putnam, Crouch, and Salazar deny each and every allegation contained in Plaintiff's Complaint. Defendants assert their entitlement to qualified, official, sovereign, and Eleventh Amendment immunity as they apply. Defendants also assert the affirmative defenses of statute of limitations and res judicata/collateral estoppel.

Defendants ask the Court to deny Plaintiff any and all relief demanded in his complaint and that they recover their costs including reasonable attorney's fees and such other relief as to which the Court deems they are entitled.

Defendants state the failure to fully and timely exhaust administrative remedies is a bar to a plaintiff filing suit in the federal court pursuant to 42 U.S.C. section 1997e(e).

Defendants demand a trial by jury.

Respectfully Submitted,

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Attorney General of Texas

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/s/Briana M. Webb
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**Attorneys for Defendants Putnam, Crouch, and
Salazar**

NOTICE OF ELECTRONIC FILING

I, **BRIANA M. WEBB**, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing a true copy of the above **Defendants Putnam, Crouch, and Salazar's Answer and Jury Demand** in accordance with the Electronic Case Files System of the Southern District of Texas on August 15, 2016.

/s/Briana M. Webb
BRIANA M. WEBB
Assistant Attorney General

CERTIFICATE OF SERVICE

I, **BRIANA M. WEBB**, Assistant Attorney General of Texas, certifies that a true copy of the above **Defendants Putnam, Crouch, and Salazar's Answer and Jury Demand** has been served by placing it in United States Mail, postage prepaid, on August 15, 2016, addressed to:

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/s/ Briana M. Webb

BRIANA M. WEBB

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